

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION**

UNITED STATES OF AMERICA	§	
	§	
VS.	§	CRIMINAL NO. M-14-483-01
	§	
MARIA PATRICIA MEDINA	§	

MOTION TO EXTEND SURRENDER DATE

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES, MARIA PATRICIA MEDINA the Defendant in the above-styled and numbered cause, by and through her attorney of record RICARDO L. SALINAS and files this his Motion to Extend Surrender Date and in support thereof would show the following:

I.

The Defendant was sentenced on July 23, 2014. The Defendant was released on Bond April 11, 2014, and continues her release on said bond.

Further, on July 23, 2014, the Defendant was ordered to report to the U.S. Marshal on September 23, 2014 by 5:00 p.m. to be advised what institution and what date she will surrender to a Federal Facility.

The Defendant is requesting this Honorable Court to extend her surrender date of September 23, 2014, until after December 2014, to due to the fact that she is presently finalizing some personal financial matters that relate to her children's education.

In addition, the defendant is currently one of my employees and will continue to be employed with my office once she has disposed of her sentence. Therefore undersigned counsel is requesting additional time for the Defendant to self surrender in order to replace Mrs. Medina temporarily.

Respectfully submitted,

SALINAS FLORES
2011 N. Conway
Mission, Texas 78572
(956) 584-3900
(956) 580-9688 facsimile

BY/s/ Ricardo L. Salinas
RICARDO L. SALINAS
State Bar No. 00786220
Federal ID No.: 19693

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing motion has been delivered e-mail ECF system to the U.S. Attorney's office on this **28th day of August, 2014**. I further certify that:

CERTIFICATE OF CONFERENCE

I have conferred with the Assistant United States Attorney in charge of this case, and he/she, they are:

X_____ Is opposed to this motion
_____ not opposed to this motion.
_____ Has no opinion regarding this motion.
_____ Would prefer to respond in writing.
_____ I attempted to confer with the Assistant United States Attorney and US Probation in charge of this case, but he/she/they were/was unavailable.

/s/ Ricardo L. Salinas
RICARDO L. SALINAS

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§ **CRIMINAL NO. M-14-483-01**

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MARIA PATRICIA MEDINA

§

ORDER

On this day came on for consideration, Defendant's Motion to Extend Surrender Date in the above entitled and numbered cause. After consideration of same, this Court is of the opinion that said Motion be GRANTED.

IT IS THEREFORE ORDERED, that the interest of justice, this Court hereby orders that the surrender date for defendant Maria Patricia Medina, in the above-entitled and numbered cause be extended until _____.20_____.

SIGNED on this the ____ day of _____, 2014.

UNITED STATES DISTRICT JUDGE